

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2014 OCT 14 P 3:23

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

CENTRAL SOURCE LLC
P.O. Box 105283
Atlanta, Georgia 30348,

Plaintiff,

v.

anualcreditreport.com
annacreditreport.com
annalceditreport.com
annalcrditreport.com
annalcredireport.com
annalcrediteport.com
annalcreditreort.com
annalcreditrepor.com
annalcreditrepot.com
annalcreditreprt.com
annalcreditrport.com
annalcredtreport.com
annalcreitreport.com
annalfreecreditreport.com
annalreditreport.com
annkalcreditreport.com
annlcreditreport.com
annoalcreditreport.com
annuaceditreport.com
annuacrditreport.com
annuacredireport.com
annuacrediteport.com
annuacreditreort.com
annuacreditrepor.com
annuacreditrepot.com
annuacreditreprt.com
annuacreditrport.com
annuacredtreport.com
annuacreitreport.com
annuafreecreditreport.com
annualcedireport.com
annualcediteport.com

Civil Action No. 1:14 cv 1345
LOG/JFA

annualceditreort.com
annualceditrepot.com
annualceditreprt.com
annualceditrport.com
annualcedtreport.com
annualceitreport.com
annualcgeditreport.com
annualcrdireport.com
annualcrditeport.com
annualcrditreort.com
annualcrditrepor.com
annualcrditrepot.com
annualcrditreprt.com
annualcredetreport.org
annualcredetreports.com
annualcredieport.com
annualcredihreport.com
annualcredireort.com
annualcredirepot.com
annualcredireprt.com
annualcredirport.com
annualcrediteort.com
annualcreditepor.com
annualcrediteprt.com
annualcreditfreereport.com
annualcreditreor.com
annualcreditreot.com
annualcreditrepogt.com
annualcreditreporh.com
annualcreditreporter.com
annualcreditreportforfree.com
annualcreditreportwebsite.com
annualcreditrepr.com
annualcreditrept.com
annualcreditrert.com
annualcreditrport.com
annualcreditrpot.com
annualcreditsreport.org
annualcreditsreports.com
annualcredteport.com
annualcredtreort.com
annualcredtrepor.com
annualcredtrepot.com
annualcredtreprt.com
annualcredtrport.com
annualcreireport.com

annualcreiteport.com
annualcreitreort.com
annualcreitrepor.com
annualcreitrepot.com
annualcreitreprt.com
annualcreitrport.com
annualcretidreport.com
annualcrfditreport.com
annualcridetreport.com
annualcridetreports.com
annualcriditreports.com
annualfeecreditreport.com
annualfreecreditreport.com
annualfreeceditreport.com
annualfreecrditreport.com
annualfreecredireport.com
annualfreecrediteport.com
annualfreecreditrepor.com
annualfreecreditrepot.com
annualfreecreditreprt.com
annualfreecreditrport.com
annualfreecreditscore.com
annualfreecredtreport.com
annualfreecreitreport.com
annualfreereditreport.com
annualrditreport.com
annualredireport.com
annualrediteport.com
annualreditreort.com
annualreditrepot.com
annualreditreprt.com
annualreditrport.com
annualredtreport.com
annualreecreditreport.com
annualreitreport.com
annuareditreport.com
annuelcreditreport.org
annuelcreditreports.com
annuelfreecreditreport.com
annulceditreport.com
annulcrditreport.com
annulcredireport.com
annulcrediteport.com
annulcreditreort.com
annulcreditrepor.com
annulcreditrepot.com

annulcreditrepot.com
annulcreditreport.com
annulcredtreport.com
annulcreitreport.com
annulfreecreditreport.com
annulreditreport.com
annuxlcreditreport.com
anuaalcreditreport.com
anuacreditreport.com
anuacreditreport.com
anuakcreditreport.com
anuaklcreditreport.com
anualccreditreport.com
anualceditreport.com
anualceeditreport.com
anualcereditreport.com
anualcrdeitreport.com
anualcrditreport.com
anualcredfitreport.com
anualcrediitreport.com
anualcrediotreport.com
anualcredireport.com
anualcredirtreport.com
anualcrediteeport.com
anualcrediteport.com
anualcreditereport.com
anualcreditreeport.com
anualcreditreoot.com
anualcreditreort.com
anualcreditrepior.com
anualcreditrepirt.com
anualcreditrepoert.com
anualcreditrepoet.com
anualcreditrepoirt.com
anualcreditrepoort.com
anualcreditrepopr.com
anualcreditrepor.com
anualcreditreporet.com
anualcreditreporr.com
anualcreditreporrt.com
anualcreditreportr.com
anualcreditreportt.com
anualcreditreporty.com
anualcreditrepory.com
anualcreditreporyt.com
anualcreditrepotr.com

anualcreditrepotr.com
anualcreditrepott.com
anualcreditrepprt.com
anualcreditrerport.com
anualcreditrewport.com
anualcreditrport.com
anualcreditrrport.com
anualcreditртеport.com
anualcreditrweport.com
anualcreditrwport.com
anualcreditteport.com
anualcredittreport.com
anualcredityreport.com
anualcrediutreport.com
anualcrediyreport.com
anualcrediytreport.com
anualcredoitreport.com
anualcredotreport.com
anualcredsitreport.com
anualcredireport.com
anualcredtreport.com
anualcreduitreport.com
anualcredutreport.com
anualcreeditreport.com
anualcrefditreport.com
anualcrefitreport.com
anualcreitreport.com
anualccreditreport.com
anualcresditreport.com
anualcresitreport.com
anualcrewditreport.com
anualcrrditreport.com
anualcrreditreport.com
anualcrteditreport.com
anualcrwditreport.com
anualcrweditreport.com
anualcteditreport.com
anualctreditreport.com
anualcvreditreport.com
anualcxreditreport.com
anualkcreditreport.com
anualrcreditreport.com
anualreditreport.com
anualvcreditreport.com
anualvreditreport.com
anualxcreditreport.com

anualxcreditreport.com
anuaslcreditreport.com
anulacreditreport.com
anusalcreditreport.com
anuslcreditreport.com
anuyalcreditreport.com
anyalcreditreport.com
freeannuaalcreditreport.com
freeannualceditreport.com
freeanunalcreditreport.com
wwwannualreditreport.com

Defendants.

COMPLAINT

Plaintiff Central Source LLC, by counsel, alleges as follows for its *in rem* Complaint against Defendants: anualcreditreport.com, annacreditreport.com, annalceditreport.com, annalcrditreport.com, annalcredireport.com, annalcrediteport.com, annalcreditreort.com, annalcreditrepor.com, annalcreditrepot.com, annalcreditreprt.com, annalcreditrport.com, annalcredtreport.com, annalcreitreport.com, annalfreecreditreport.com, annalreditreport.com, annkalcreditreport.com, annlcreditreport.com, annoalcreditreport.com, annuaceditreport.com, annuacrditreport.com, annuacredireport.com, annuacrediteport.com, annuacreditreort.com, annuacreditrepor.com, annuacreditrepot.com, annuacreditreprt.com, annuacreditrport.com, annuacredtreport.com, annuacreitreport.com, annuafreecreditreport.com, annualcedireport.com, annualcediteport.com, annualceditreort.com, annualceditrepot.com, annualceditreprt.com, annualceditrport.com, annualcedtreport.com, annualceitreport.com, annualcgeditreport.com, annualcrdireport.com, annualcrditeport.com, annualcrditreort.com, annualcrditrepor.com, annualcrditrepot.com, annualcrditreprt.com, annualcredetreport.org, annualcredetreports.com, annualcredieport.com, annualcredihreport.com, annualcredireort.com, annualcredirepot.com,

annualcredireprt.com, annualcredirport.com, annualcrediteort.com, annualcreditepor.com,
annualcrediteprt.com, annualcreditfreereport.com, annualcreditreor.com, annualcreditreot.com,
annualcreditrepogt.com, annualcreditreporh.com, annualcreditreporter.com,
annualcreditreportforfree.com, annualcreditreportwebsite.com, annualcreditrepr.com,
annualcreditrept.com, annualcreditrert.com, annualcreditrftport.com, annualcreditrpot.com,
annualcreditsreport.org, annualcreditsreports.com, annualcredteport.com, annualcredtreort.com,
annualcredtrepor.com, annualcredtrepot.com, annualcredtreprt.com, annualcredtrport.com,
annualcreireport.com, annualcreiteport.com, annualcreitreort.com, annualcreitrepor.com,
annualcreitrepot.com, annualcreitreprt.com, annualcreitrport.com, annualcretidreport.com,
annualcrfditreport.com, annualcridetreport.com, annualcridetreports.com,
annualcriditreports.com, annualfeecreditreport.com, annualfreecreditreport.com,
annualfreeceditreport.com, annualfreecrditreport.com, annualfreecredireport.com,
annualfreecrediteport.com, annualfreecreditrepor.com, annualfreecreditrepot.com,
annualfreecreditreprt.com, annualfreecreditrport.com, annualfreecreditscore.com,
annualfreecredtreport.com, annualfreecreitreport.com, annualfreereditreport.com,
annualrditreport.com, annualredireport.com, annualrediteport.com, annualreditreort.com,
annualreditrepot.com, annualreditreprt.com, annualreditrport.com, annualredtreport.com,
annualreecreditreport.com, annualreitreport.com, annuareditreport.com, annuelcreditreport.org,
annuelcreditreports.com, annuelfreecreditreport.com, annulcreditreport.com,
annulcrditreport.com, annulcredireport.com, annulcrediteport.com, annulcreditreort.com,
annulcreditrepor.com, annulcreditrepot.com, annulcreditreprt.com, annulcreditrport.com,
annulcredtreport.com, annulcreitreport.com, annulfreecreditreport.com, annulreditreport.com,
annuxlcreditreport.com, anuaalcreditreport.com, anuacreditreport.com, anuacreditreport.com,

anuakcreditreport.com, anuaklcreditreport.com, anualccreditreport.com, anualceditreport.com, anualceeditreport.com, anualcereditreport.com, anualcrdeitreport.com, anualcrditreport.com, anualcredfitreport.com, anualcrediitreport.com, anualcrediotreport.com, anualcredireport.com, anualcredirtreport.com, anualcrediteeport.com, anualcrediteport.com, anualcreditereport.com, anualcreditreeport.com, anualcreditreoot.com, anualcreditreort.com, anualcreditrepiort.com, anualcreditrepirt.com, anualcreditrepoert.com, anualcreditrepoet.com, anualcreditrepiort.com, anualcreditrepoort.com, anualcreditrepopr.com, anualcreditrepor.com, anualcreditreporet.com, anualcreditreporr.com, anualcreditreporrt.com, anualcreditreportr.com, anualcreditreportt.com, anualcreditreporty.com, anualcreditrepory.com, anualcreditreporyt.com, anualcreditrepotr.com, anualcreditrepotr.com, anualcreditrepott.com, anualcreditreppt.com, anualcreditrerport.com, anualcreditrewport.com, anualcreditrport.com, anualcreditrrport.com, anualcreditrtreport.com, anualcreditrweport.com, anualcreditrwport.com, anualcreditteport.com, anualcredittreport.com, anualcredityreport.com, anualcrediutreport.com, anualcrediyreport.com, anualcrediytreport.com, anualcredoitreport.com, anualcredotreport.com, anualcreditsreport.com, anualcredtireport.com, anualcredtreport.com, anualcreduitreport.com, anualcredutreport.com, anualcreeditreport.com, anualcrefditreport.com, anualcrefitreport.com, anualcreitreport.com, anualcrereditreport.com, anualcresditreport.com, anualcresitreport.com, anualcrewditreport.com, anualcrrditreport.com, anualcrreditreport.com, anualcrteditreport.com, anualcrwditreport.com, anualcrweditreport.com, anualcteditreport.com, anualctreditreport.com, anualcvreditreport.com, anualcxreditreport.com, anualkcreditreport.com, anualrceditreport.com, anualreditreport.com, anualvcreditreport.com, anualvreditreport.com, anualxcreditreport.com, anualxreditreport.com, anuaslcreditreport.com, anulacreditreport.com, anusalcreditreport.com, anuslcreditreport.com, anuyalcreditreport.com,

anyalcreditreport.com, freeannuaalcreditreport.com, freeannualceditreport.com, freeanunalcreditreport.com, and wwwannualreditreport.com (the “Domain Names”).

NATURE OF THE SUIT

1. This is an *in rem* action for cybersquatting under the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Plaintiff’s invaluable rights in the distinctive AnnualCreditReport mark have been deliberately infringed through the bad faith registration and use of the Defendant Domain Names, which Domain Names are confusingly similar to the AnnualCreditReport mark.

PARTIES

2. Central Source LLC (“Central Source”) is a corporation organized and existing under the laws of Delaware with a principal business address of P.O. Box 105283, Atlanta, Georgia, 30348.

3. The 218 Defendant Domain Names are all presently registered in the name of “John Xu,” of “Luxuan Discript Zone number 4, Guangzhou City, China.” On information and belief, “John Xu” is a fictitious name and “Luxuan Discript Zone number 4, Guangzhou City, China” is a fictitious address.

4. Registration of the 218 Defendant Domain Names was changed to “John Xu” after Central Source sent a cease and desist letter to the prior registrant of the Domain Names.

5. anialcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for anialcreditreport.com is attached as Exhibit 1.

6. annacreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annacreditreport.com is attached as Exhibit 2.

7. annalceditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annalceditreport.com is attached as Exhibit 3.

8. annalcrditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annalcrditreport.com is attached as Exhibit 4.

9. annalcredireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annalcredireport.com is attached as Exhibit 5.

10. annalcrediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annalcrediteport.com is attached as Exhibit 6.

11. annalcreditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annalcreditreort.com is attached as Exhibit 7.

12. annalcreditrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annalcreditrepor.com is attached as Exhibit 8.

13. annalcreditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalcreditrepot.com is attached as Exhibit 9.

14. annalcreditreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalcreditreprt.com is attached as Exhibit 10.

15. annalcreditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalcreditrport.com is attached as Exhibit 11.

16. annalcredtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalcredtreport.com is attached as Exhibit 12.

17. annalcreitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalcreitreport.com is attached as Exhibit 13.

18. annalfreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalfreecreditreport.com is attached as Exhibit 14.

19. annalreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annalreditreport.com is attached as Exhibit 15.

20. annkalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annkalcreditreport.com is attached as Exhibit 16.

21. annlcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annlcreditreport.com is attached as Exhibit 17.

22. annoalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annoalcreditreport.com is attached as Exhibit 18.

23. annuacreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreditreport.com is attached as Exhibit 19.

24. annuacrditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacrditreport.com is attached as Exhibit 20.

25. annuacredireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacredireport.com is attached as Exhibit 21.

26. annuacrediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacrediteport.com is attached as Exhibit 22.

27. annuacreditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreditreort.com is attached as Exhibit 23.

28. annuacreditrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreditrepor.com is attached as Exhibit 24.

29. annuacreditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreditrepot.com is attached as Exhibit 25.

30. annuacreditreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreditreprt.com is attached as Exhibit 26.

31. annuacreditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreditrport.com is attached as Exhibit 27.

32. annuacredtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacredtreport.com is attached as Exhibit 28.

33. annuacreitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuacreitreport.com is attached as Exhibit 29.

34. annuafreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A

copy of the domain name registration record for annuafreecreditreport.com is attached as Exhibit 30.

35. annualcedireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcedireport.com is attached as Exhibit 31.

36. annualcediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcediteport.com is attached as Exhibit 32.

37. annualceditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualceditreort.com is attached as Exhibit 33.

38. annualceditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualceditrepot.com is attached as Exhibit 34.

39. annualceditreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualceditreprt.com is attached as Exhibit 35.

40. annualceditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualceditrport.com is attached as Exhibit 36.

41. annualcedtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcedtreport.com is attached as Exhibit 37.

42. annualceitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualceitreport.com is attached as Exhibit 38.

43. annualcgeditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcgeditreport.com is attached as Exhibit 39.

44. annualcrdireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrdireport.com is attached as Exhibit 40.

45. annualcrditeport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrditeport.com is attached as Exhibit 41.

46. annualcrditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrditreort.com is attached as Exhibit 42.

47. annualcrditrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrditrepor.com is attached as Exhibit 43.

48. annualcrditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrditrepot.com is attached as Exhibit 44.

49. annualcridtreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcridtreprt.com is attached as Exhibit 45.

50. annualcredetreport.org is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredetreport.org is attached as Exhibit 46.

51. annualcredetreports.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredetreports.com is attached as Exhibit 47.

52. annualcredieport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredieport.com is attached as Exhibit 48.

53. annualcredihreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredihreport.com is attached as Exhibit 49.

54. annualcredireort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredireort.com is attached as Exhibit 50.

55. annualcredirepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredirepot.com is attached as Exhibit 51.

56. annualcredireprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcredireprt.com is attached as Exhibit 52.

57. annualcredirport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcredirport.com is attached as Exhibit 53.

58. annualcrediteort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrediteort.com is attached as Exhibit 54.

59. annualcreditepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreditepor.com is attached as Exhibit 55.

60. annualcrediteprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrediteprt.com is attached as Exhibit 56.

61. annualcreditfreereport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreditfreereport.com is attached as Exhibit 57.

62. annualcreditreor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreditreor.com is attached as Exhibit 58.

63. annualcreditreot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditreot.com is attached as Exhibit 59.

64. annualcreditrepogt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditrepogt.com is attached as Exhibit 60.

65. annualcreditreporh.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditreporh.com is attached as Exhibit 61.

66. annualcreditreporter.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditreporter.com is attached as Exhibit 62.

67. annualcreditreportforfree.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditreportforfree.com is attached as Exhibit 63.

68. annualcreditreportwebsite.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditreportwebsite.com is attached as Exhibit 64.

69. annualcreditrepr.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditrepr.com is attached as Exhibit 65.

70. annualcredit rept.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredit rept.com is attached as Exhibit 66.

71. annualcredit rert.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredit rert.com is attached as Exhibit 67.

72. annualcredit r fport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredit r fport.com is attached as Exhibit 68.

73. annualcredit r pot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredit r pot.com is attached as Exhibit 69.

74. annualcreditsreport.org is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditsreport.org is attached as Exhibit 70.

75. annualcreditsreports.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreditsreports.com is attached as Exhibit 71.

76. annualcredteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredteport.com is attached as Exhibit 72.

77. annualcredtreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredtreort.com is attached as Exhibit 73.

78. annualcredtrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredtrepor.com is attached as Exhibit 74.

79. annualcredrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredrepot.com is attached as Exhibit 75.

80. annualcredtreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredtreprt.com is attached as Exhibit 76.

81. annualcredtrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcredtrport.com is attached as Exhibit 77.

82. annualcreireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreireport.com is attached as Exhibit 78.

83. annualcreiteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualcreiteport.com is attached as Exhibit 79.

84. annualcreitreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreitreort.com is attached as Exhibit 80.

85. annualcreitrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreitrepor.com is attached as Exhibit 81.

86. annualcreitrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreitrepot.com is attached as Exhibit 82.

87. annualcreitreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreitreprt.com is attached as Exhibit 83.

88. annualcreitrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcreitrport.com is attached as Exhibit 84.

89. annualcretidreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcretidreport.com is attached as Exhibit 85.

90. annualcrfditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcrfditreport.com is attached as Exhibit 86.

91. annualcridetreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcridetreport.com is attached as Exhibit 87.

92. annualcridetreports.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcridetreports.com is attached as Exhibit 88.

93. annualcriditreports.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualcriditreports.com is attached as Exhibit 89.

94. annualfeecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfeecreditreport.com is attached as Exhibit 90.

95. annualfrecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfrecreditreport.com is attached as Exhibit 91.

96. annualfreeceditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreeceditreport.com is attached as Exhibit 92.

97. annualfreecrditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecrditreport.com is attached as Exhibit 93.

98. annualfreecredireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecredireport.com is attached as Exhibit 94.

99. annualfreecrediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecrediteport.com is attached as Exhibit 95.

100. annualfreecreditrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecreditrepor.com is attached as Exhibit 96.

101. annualfreecreditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecreditrepot.com is attached as Exhibit 97.

102. annualfreecreditreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecreditreprt.com is attached as Exhibit 98.

103. annualfreecreditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualfreecreditrport.com is attached as Exhibit 99.

104. annualfreecreditscore.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualfreecreditscore.com is attached as Exhibit 100.

105. annualfreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 101.

106. annualfreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 102.

107. annualfreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 103.

108. annualreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualreditreport.com is attached as Exhibit 104.

109. annualredireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualredireport.com is attached as Exhibit 105.

110. annualrediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annualrediteport.com is attached as Exhibit 106.

111. annualreditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualreditreort.com is attached as Exhibit 107.

112. annualreditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualreditrepot.com is attached as Exhibit 108.

113. annualreditreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualreditreprt.com is attached as Exhibit 109.

114. annualreditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualreditrport.com is attached as Exhibit 110.

115. annualredtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualredtreport.com is attached as Exhibit 111.

116. annualreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualreecreditreport.com is attached as Exhibit 112.

117. annualreitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annualreitreport.com is attached as Exhibit 113.

118. annuareditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annuareditreport.com is attached as Exhibit 114.

119. annuelcreditreport.org is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annuelcreditreport.org is attached as Exhibit 115.

120. annuelcreditreports.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annuelcreditreports.com is attached as Exhibit 116.

121. annulfreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annulfreecreditreport.com is attached as Exhibit 117.

122. annulceditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annulceditreport.com is attached as Exhibit 118.

123. annulcrditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annulcrditreport.com is attached as Exhibit 119.

124. annulcredireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for annulcredireport.com is attached as Exhibit 120.

125. annulcrediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcrediteport.com is attached as Exhibit 121.

126. annulcreditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcreditreort.com is attached as Exhibit 122.

127. annulcreditrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcreditrepor.com is attached as Exhibit 123.

128. annulcreditrepot.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcreditrepot.com is attached as Exhibit 124.

129. annulcreditreprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcreditreprt.com is attached as Exhibit 125.

130. annulcreditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcreditrport.com is attached as Exhibit 126.

131. annulcredtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcredtreport.com is attached as Exhibit 127.

132. annulcreitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulcreitreport.com is attached as Exhibit 128.

133. annulfreecreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulfreecreditreport.com is attached as Exhibit 129.

134. annulreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annulreditreport.com is attached as Exhibit 130.

135. annuxlcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for annuxlcreditreport.com is attached as Exhibit 131.

136. anuaalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuaalcreditreport.com is attached as Exhibit 132.

137. anuacreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuacreditreport.com is attached as Exhibit 133.

138. anuacreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuacreditreport.com is attached as Exhibit 134.

139. anuakcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuakcreditreport.com is attached as Exhibit 135.

140. anuaklcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuaklcreditreport.com is attached as Exhibit 136.

141. anualccreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualccreditreport.com is attached as Exhibit 137.

142. anualceditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualceditreport.com is attached as Exhibit 138.

143. anualceeditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualceeditreport.com is attached as Exhibit 139.

144. anualcereditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcereditreport.com is attached as Exhibit 140.

145. anualcrdeitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrdeitreport.com is attached as Exhibit 141.

146. anualcrditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrditreport.com is attached as Exhibit 142.

147. anualcredfitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredfitreport.com is attached as Exhibit 143.

148. anualcrediitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediitreport.com is attached as Exhibit 144.

149. anualcrediotreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediotreport.com is attached as Exhibit 145.

150. anualcredireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredireport.com is attached as Exhibit 146.

151. anualcredirtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredirtreport.com is attached as Exhibit 147.

152. anualcrediteeport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediteeport.com is attached as Exhibit 148.

153. anualcrediteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediteport.com is attached as Exhibit 149.

154. anualcreditereport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditereport.com is attached as Exhibit 150.

155. anualcreditreeport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreeport.com is attached as Exhibit 151.

156. anualcreditreoort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreoort.com is attached as Exhibit 152.

157. anualcreditreort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreort.com is attached as Exhibit 153.

158. anualcreditrepiort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepiort.com is attached as Exhibit 154.

159. anualcreditrepirt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepirt.com is attached as Exhibit 155.

160. anualcreditrepoert.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepoert.com is attached as Exhibit 156.

161. anualcreditrepoet.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepoet.com is attached as Exhibit 157.

162. anualcreditrepourt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepourt.com is attached as Exhibit 158.

163. anualcreditrepoort.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepoort.com is attached as Exhibit 159.

164. anualcreditrepopr.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepopr.com is attached as Exhibit 160.

165. anualcreditrepor.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepor.com is attached as Exhibit 161.

166. anualcreditreporet.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreporet.com is attached as Exhibit 162.

167. anualcreditreporr.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreporr.com is attached as Exhibit 163.

168. anualcreditreporr.t.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreporr.t.com is attached as Exhibit 164.

169. anualcreditreportr.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreportr.com is attached as Exhibit 165.

170. anualcreditreportt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreportt.com is attached as Exhibit 166.

171. anualcreditreporty.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreporty.com is attached as Exhibit 167.

172. anualcreditrepory.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepory.com is attached as Exhibit 168.

173. anualcreditreporyt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditreporyt.com is attached as Exhibit 169.

174. anualcreditrepotr.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepotr.com is attached as Exhibit 170.

175. anualcreditrepotrt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepotrt.com is attached as Exhibit 171.

176. anualcreditrepott.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepott.com is attached as Exhibit 172.

177. anualcreditrepprt.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrepprt.com is attached as Exhibit 173.

178. anualcreditrerport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrerport.com is attached as Exhibit 174.

179. anualcreditrewport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrewport.com is attached as Exhibit 175.

180. anualcreditrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrport.com is attached as Exhibit 176.

181. anualcreditrrport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrrport.com is attached as Exhibit 177.

182. anualcreditrtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrtreport.com is attached as Exhibit 178.

183. anualcreditrweport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrweport.com is attached as Exhibit 179.

184. anualcreditrwport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditrwport.com is attached as Exhibit 180.

185. anualcreditteport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditteport.com is attached as Exhibit 181.

186. anualcredittreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredittreport.com is attached as Exhibit 182.

187. anualcredityreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredityreport.com is attached as Exhibit 183.

188. anualcrediutreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediutreport.com is attached as Exhibit 184.

189. anualcrediyreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediyreport.com is attached as Exhibit 185.

190. anualcrediytreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrediytreport.com is attached as Exhibit 186.

191. anualcredoitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredoitreport.com is attached as Exhibit 187.

192. anualcredotreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredotreport.com is attached as Exhibit 188.

193. anualcreditsreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreditsreport.com is attached as Exhibit 189.

194. anualcredtireport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredtireport.com is attached as Exhibit 190.

195. anualcredtreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredtreport.com is attached as Exhibit 191.

196. anualcreduitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreduitreport.com is attached as Exhibit 192.

197. anualcredutreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcredutreport.com is attached as Exhibit 193.

198. anualcreeditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreeditreport.com is attached as Exhibit 194.

199. anualcrefditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrefditreport.com is attached as Exhibit 195.

200. anualcrefitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrefitreport.com is attached as Exhibit 196.

201. anualcreitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreitreport.com is attached as Exhibit 197.

202. anualcrereditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrereditreport.com is attached as Exhibit 198.

203. anualcresditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcresditreport.com is attached as Exhibit 199.

204. anualcresitreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcresitreport.com is attached as Exhibit 200.

205. anualcreweditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcreweditreport.com is attached as Exhibit 201.

206. anualcrrditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrrditreport.com is attached as Exhibit 202.

207. anualcrreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrreditreport.com is attached as Exhibit 203.

208. anualcrteditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrteditreport.com is attached as Exhibit 204.

209. anualcrwditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrwditreport.com is attached as Exhibit 205.

210. anualcrweditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcrweditreport.com is attached as Exhibit 206.

211. anualcteditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcteditreport.com is attached as Exhibit 207.

212. anualctreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualctreditreport.com is attached as Exhibit 208.

213. anualcvreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcvreditreport.com is attached as Exhibit 209.

214. anualcxreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualcxreditreport.com is attached as Exhibit 210.

215. anualkcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualkcreditreport.com is attached as Exhibit 211.

216. anualrceditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualrceditreport.com is attached as Exhibit 212.

217. anualreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualreditreport.com is attached as Exhibit 213.

218. anualvcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualvcreditreport.com is attached as Exhibit 214.

219. anualvreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualvreditreport.com is attached as Exhibit 215.

220. anualxcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualxcreditreport.com is attached as Exhibit 216.

221. anualxreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualxreditreport.com is attached as Exhibit 217.

222. anualslcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anualslcreditreport.com is attached as Exhibit 218.

223. anulacreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anulacreditreport.com is attached as Exhibit 219.

224. anusalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anusalcreditreport.com is attached as Exhibit 220.

225. anuslcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuslcreditreport.com is attached as Exhibit 221.

226. anuyalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anuyalcreditreport.com is attached as Exhibit 222.

227. anyalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for anyalcreditreport.com is attached as Exhibit 223.

228. freeannuaalcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for freeannuaalcreditreport.com is attached as Exhibit 224.

229. freeannualceditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by "John Xu". A copy of the domain name registration record for freeannualceditreport.com is attached as Exhibit 225.

230. freeannualcreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for freeannualcreditreport.com is attached as Exhibit 226.

231. wwwannualreditreport.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, is registered by “John Xu”. A copy of the domain name registration record for wwwannualreditreport.com is attached as Exhibit 227.

JURISDICTION, VENUE AND JOINDER

232. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d).

233. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338(a).

234. This Court has *in rem* jurisdiction over the Defendant domain names pursuant to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A)(i)(I) because the registrant of all of the Defendant domain names is purportedly located in China, is on information and belief a fictitious person/entity, and therefore Central Source cannot obtain in personam jurisdiction over a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

235. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the .COM domain name registry, VeriSign, Inc., and the .org domain name registry, Public Interest Registry, are situated in this judicial district, and the Defendant Domain Names are all .COM or .ORG domain names.

236. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) in that the *in rem* cybersquatting claim set forth herein arises out of the same series of transactions and the same question of law is common to all of the Defendant Domain Names.

237. The Defendant Domain Names were all registered through the ICANN accredited registrar Moniker Online Services LLC and the registration records for Defendant Domain Names all list “John Xu” as the registrant with an address of “Luxuan Discript Zone number 4, Guangzhou City, China.”

CENTRAL SOURCE’S RIGHTS

238. Central Source was created in 2004 to provide consumers with a secure means to request and obtain a free credit report once every 12 months in accordance with the Fair and Accurate Credit Transactions Act. 15 U.S.C. § 1681j.

239. Central Source provides this service to consumers through a website and service available at www.AnnualCreditReport.com, and AnnualCreditReport is the only service/site authorized by the U.S. Federal Trade Commission and the Consumer Financial Protection Bureau to provide this service.

240. Central Source registered the AnnualCreditReport.com domain name on June, 25 2004.

241. Over the course of June and July of 2004, Central Source registered a large number of additional related domain names and now owns over 250 domain names representing typographical errors of AnnualCreditReport as a defensive measure intended to protect consumers by limiting cybersquatting of domain name registrations related to AnnualCreditReport.

242. Central Source began promoting the AnnualCreditReport mark and website in a press release issued on November 23, 2004. This promotion resulted in several major media organizations nationwide publishing stories that referenced the AnnualCreditReport mark and the AnnualCreditReport.com website address. These organizations included *The Chicago Tribune*, *The Kansas City Star*, *The New York Times*, *The Sacramento Bee*, *The San Francisco Chronicle*, *The Star-Ledger*, *USA TODAY*, and *The Washington Post*.

243. As a result of Central Source's promotion of the AnnualCreditReport mark and AnnualCreditReport.com domain name and the corresponding media coverage, consumers immediately associated the AnnualCreditReport mark and the AnnualCreditReport.com domain name with Credit Source.

244. The AnnualCreditReport service was launched for public use on November 30, 2004.

245. Since opening for public use, AnnualCreditReport has received over 500,000,000 visits to AnnualCreditReport.com through September 30, 2013.

246. The U.S. Federal Trade Commission has engaged in a wide ranging public service campaign promoting AnnualCreditReport through informational websites, television and Internet commercials, and audio public service announcements.

247. The Federal Trade Commission has also previously pursued unauthorized Internet uses of AnnualCreditReport and typographical variations of AnnualCreditReport.

248. The Credit Card Accountability Responsibility and Disclosure Act (the "CARD Act") requires certain mandatory references to AnnualCreditReport.com whenever an advertisement or website offers a free credit report.

249. Pursuant to 15 U.S.C. § 1681j(g):

[A]ny advertisement for a free credit report in any medium shall prominently disclose in such advertisement that free credit reports are available under Federal law at: "AnnualCreditReport.com" (or such other source as may be authorized under Federal law).

250. Pursuant to 12 C.F.R. § 1022.138(b):

(3) All advertisements for free credit reports in print shall include the following disclosure in the form specified below and in close proximity to the first mention of a free credit report. The first line of the disclosure shall be centered and contain only the following language: "THIS NOTICE IS REQUIRED BY LAW." Immediately below the first line of the disclosure the following language shall appear: "You have the right to a free credit report from AnnualCreditReport.com or (877) 322-8228, the ONLY authorized source under Federal law." ...

(4) Web sites. Any Web site offering free credit reports must display the disclosure set forth in paragraphs (b)(4)(i), (ii), and (v) of this section on each page that mentions a free credit report and on each page of the ordering process. (i) The first element of the disclosure shall be a header that is centered and shall consist of the following text: "THIS NOTICE IS REQUIRED BY LAW. ... ; (ii) The second element of the disclosure shall appear below the header required by paragraph (b)(4)(i) and shall consist of the following text: "You have the right to a free credit report from AnnualCreditReport.com or (877) 322-8228, the ONLY authorized source under Federal law." The reference to AnnualCreditReport.com shall be an operational hyperlink to the centralized source, underlined, and in the same color as the hyperlink to consumerfinance.gov/learnmore required in § 1022.138(b)(4)(i); (v) The third element of the disclosure shall appear below the text required by paragraph (b)(4)(ii) and shall be an operational hyperlink to AnnualCreditReport.com that appears as a centered button containing the following language: "Take me to the authorized source."

251. The mandatory disclosures required by federal law under 15 U.S.C. § 1681j(g) and 12 C.F.R. § 1022.138 have resulted in millions of references to AnnualCreditReport being presented to consumers.

252. Through promotion of AnnualCreditReport by Central Source, the Federal Trade Commission, and third parties that are statutorily required identify AnnualCreditReport, the AnnualCreditReport mark has become famous and/or distinctive throughout the United States in connection with Central Source's services.

253. The Defendant Domain Names represent unauthorized colorable imitations of the AnnualCreditReport mark, which further demonstrates that the AnnualCreditReport mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

254. Consumers have come to distinguish and recognize the legitimacy of Central Source's services as a result of the use and widespread promotion of the AnnualCreditReport mark. The AnnualCreditReport mark is entitled to common law trademark rights.

255. The AnnualCreditReport mark is also registered on the Principal Trademark Register of the U.S. Patent and Trademark Office under registration number 4152650. *See* Exhibit 224.

256. Central Source's federal registration for the AnnualCreditReport mark is *prima facie* evidence of the validity of the mark, of Central Source's ownership of the mark, and of Central Source's exclusive right to use the mark in U.S. commerce.

UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES

257. Central Source has engaged in significant efforts to protect consumers by *inter alia* defensively registering domain names that represent typographical variations of AnnualCreditReport and by pursuing the disabling of websites and the transfer of domain names that are being used to confuse and mislead consumers.

258. Where necessary, Central Source also has successfully pursued legal action to obtain the transfer of domain names that infringe upon the AnnualCreditReport mark and were registered in bad faith. *See Central Source LLC v. annualcreditedport.com*, 14-CV-302, 2014 WL 3891667 (E.D. Va. Aug. 7, 2014); *Central Source LLC v. annualdcreditreport.com*, No. 14-

CV-304, 2014 WL 371162 (E.D. Va. Aug. 1, 2014); *Central Source LLC v. annualcreditreport-com.us*, 14-CV-305, 2014 WL 3767071 (E.D. Va. July 30, 2014).

259. The Defendant Domain Names represent typographical errors of AnnualCreditReport. The registration and use of the Defendant Domain Names reflects a type of cybersquatting known as “typosquatting.”

260. Upon information and belief, the Defendant Domain Names were registered for the purpose of obtaining Internet visitors when such visitors make a typographical error on their keyboard when attempting to reach AnnualCreditReport.com by typing “AnnualCreditReport.”

261. The use of the AnnualCreditReport mark within the Defendant Domain Names and/or associated websites is without authorization from Central Source.

262. Upon information and belief, the Defendant Domain Names do not and cannot reflect the legal name of the registrant(s) of the Domain Names.

263. Upon information and belief, the registrant(s) of the Defendant Domain Names has not engaged in bona fide noncommercial or fair use of the AnnualCreditReport mark in a website accessible under the Domain Names.

264. The websites displayed by the registrant(s) of the Defendant Domain Names are likely to be confused with Central Source’s legitimate online location at AnnualCreditReport.com and actual consumer confusion is occurring in the marketplace.

265. Upon information and belief, the registrant(s) of the Defendant Domain Names registered the Domain Names with intent to divert consumers away from Central Source’s online location AnnualCreditReport.com, for commercial gain, by creating a likelihood of confusion as to the source, sponsorship, affiliation or endorsement of the Defendant Domain Names and any sites displayed through use of the Defendant Domain Names.

266. Upon information and belief, the registrant(s) of the Defendant Domain Names is now seeking to sell the domain names to Central Source or any third party for financial gain without having used, or having an intent to use, the domain names in the bona fide offering of goods or services.

267. Upon information and belief, the registrant(s) of the Defendant Domain Names has provided material and misleading false contact information in the registration records for the Domain Names in that the registrations identify a fictitious registrant and registrant address.

268. Upon information and belief, the Defendant Domain Names were registered by the same person or entity and/or are under the control of the same person or entity.

CLAIM FOR RELIEF

Violation of the Federal Anti-Cybersquatting Consumer Protection Act

269. Central Source repeats and realleges each and every allegation set forth in the foregoing paragraphs 1-264, as though fully set forth herein.

270. Central Source's federally registered AnnualCreditReport mark is famous and/or distinctive and was famous and/or distinctive prior to the time of registration of the Defendant domain names.

271. The aforesaid acts by the registrant(s) of the Defendant Domain Names constitute registration, trafficking in, or use of domain names that are confusingly similar to Central Source's AnnualCreditReport mark, with bad faith intent to profit therefrom.

272. Central Source is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

273. Central Source, despite its due diligence, has been unable to find a real person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

274. The aforesaid acts by the registrant(s) of the Domain Names constitute unlawful cyberpiracy in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

275. The aforesaid acts have caused, and are causing, great and irreparable harm to Central Source and the public. The harm to Central Source includes harm to the value and goodwill associated with the AnnualCreditReport mark that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue. Thus, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), Central Source is entitled to an order transferring the Defendant Domain Name registrations to Central Source.

PRAYER FOR RELIEF


WHEREFORE, Central Source respectfully requests of this Court:

1. That judgment be entered in favor of Central Source on its claim of cybersquatting.
2. That the Court order the Defendant Domain Names be transferred to Central Source.
3. That any other domain names registered by the registrant(s) of the Defendant Domain Names that resemble or include the AnnualCreditReport mark be transferred to Central Source.
4. That the Court order an award of costs and reasonable attorney's fees incurred by Central Source in connection with this action pursuant to 15 U.S.C. § 1117(a); and

5. That the Court order an award to Central Source of such other and further relief as the Court may deem just and proper.

Dated: October ¹⁴~~9~~, 2014

By:



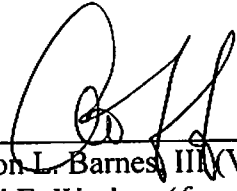
Attison L. Barnes, III (VA Bar No. 30458)
David E. Weslow (*pro hac application pending*)
WILEY REIN LLP
1776 K St. NW
Washington, DC 20006
(202) 719-7000 (phone)
(202) 719-7049 (fax)
abarnes@wileyrein.com
dweslow@wileyrein.com

*Counsel for Plaintiff
Central Source LLC*

5. That the Court order an award to Central Source of such other and further relief as the Court may deem just and proper.

Dated: October 14, 2014

By:


Attison L. Barnes, III (VA Bar No. 30458)
David E. Weslow (*for pro hac admission*)
WILEY REIN LLP
1776 K St. NW
Washington, DC 20006
(202) 719-7000 (phone)
(202) 719-7049 (fax)
abarnes@wileyrein.com
dweslow@wileyrein.com

*Counsel for Plaintiff
Central Source LLC*